

LITE DEPALMA GREENBERG, LLC

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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

GJJM ENTERPRISES, LLC d/b/a STILETTO,
185 SOUTH CAROLINA AVE, ATLANTIC
CITY, NJ 08401

Plaintiff,

v.

CITY OF ATLANTIC CITY, 1301
BACHARACH BLVD, ATLANTIC CITY, NJ
08401

CITY OF ATLANTIC CITY POLICE
DEPARTMENT, 2715 ATLANTIC AVE,
ATLANTIC CITY, NJ 08401

HENRY WHITE, CHIEF, ATLANTIC CITY
POLICE DEPARTMENT, IN HIS OFFICIAL
CAPACITY ONLY, 2715 ATLANTIC AVE.
ATLANTIC CITY, NJ 08401

Defendants.

Civil Action No. 17-cv-2492 (JHR)
(AMD)

NOTICE OF:

**(1) DEFENDANTS' CROSS-MOTION
TO DISMISS THE PLAINTIFF'S
COMPLAINT, AND**

**(2) DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

TO: THE CLERK OF COURT AND ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that the undersigned will apply to the United States District
Court, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, NJ

08101, on Monday, June 5, 2017 at 9:00 a.m. in the forenoon or as soon thereafter as counsel may be heard, for an Order: (1) denying Plaintiff's motion for preliminary injunction and (2) granting Defendants' Cross-Motion to Dismiss the Plaintiff's Complaint.

PLEASE TAKE NOTICE that in support of this motion, Defendants, will rely upon the accompanying Memorandum of Law.

PLEASE TAKE FURTHER NOTICE that at the time and place aforesaid, Defendants will request that the proposed form of Order submitted herewith be entered by the Court.

LITE DEPALMA GREENBERG, LLC

/s/ Victor A. Afanador

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Attorneys for Defendants

Dated: May 12, 2017

CERTIFICATION OF SERVICE

I, Victor A. Afanador, hereby certify under penalty of perjury that, on this day, I served a copy of: (1) the Defendants' Cross-Motion to Dismiss the Plaintiff's Complaint and (2) Opposition to Plaintiff's Motion for Preliminary Injunction and accompanying documents on all counsel of record by ECF. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

LITE DEPALMA GREENBERG, LLC

/s/ Victor A. Afanador
Attorneys for Defendants

Dated: May 12, 2017